1 **CHRISTENSEN JAMES & MARTIN** EVAN L. JAMES, ESQ. (7760) DARYL E. MARTIN, ESQ. (6735) 7440 W. Sahara Avenue 3 Las Vegas, Nevada 89117 4 Telephone: (702) 255-1718 Facsimile: (702) 255-0871 5 Email: elj@cjmlv.com, dem@cjmlv.com Attorneys for Defendants Nevada Service Employees 6 Union, Luisa Blue, and Martin Manteca 7 UNITED STATES DISTRICT COURT 8 DISTRICT OF NEVADA 9 JAVIER CABRERA, an individual; DEBORAH Case No.: 2:18-cv-00304-RFB-DJA 10 MILLER, an individual, CHERIE MANCINI, an individual; NEVADA SERVICE 11 EMPLOYEES UNION STAFF UNION ("NSEUSU"), an unincorporated association, 12 STIPULATION TO EXTEND PRETRIAL 13 Plaintiffs, ORDER AND AVAILABILITY OF VS. 14 TRIAL DATES 15 SERVICE EMPLOYEES INTERNATIONAL UNION, a nonprofit cooperative corporation; 16 LUISA BLUE, in her official capacity as Trustee of Local 1107; MARTIN MANTECA, in his 17 official capacity as Deputy Trustee of Local 18 1107; MARY K. HENRY, in her official capacity as Union President; CLARK COUNTY 19 PUBLIC EMPLOYEES ASSOCIATION dba 20 NEVADA SERVICE EMPLOYEES UNION aka SEIU LOCAL 1107, a nonprofit cooperative 21 corporation; CAROL NIETERS, an individual; DOES 1-20; and ROE CORPORATIONS 1-20, 22 inclusive, 23 Defendants. 24 25 The parties hereby notify the Court that they are unable to meet the Court's deadline for filing a pretrial order by April 14, 2021. The attorneys have met to discuss the pretrial order. The 26 issues and evidence for trial are extensive and counsel cannot prepare an effective pretrial order in 27

1	the amount of time available to do so given current	workload with other cases. The parties therefore
2	stipulate and request that the court set the full pretrial order to be due by May 14, 2021.	
3	The parties further inform the Court and sti	pulate to available trial dates of October 25-29,
4	2021 and thereafter. The parties' initial assessmen	ent is that the trial may take up to ten days to
5	complete. The parties discussed the possibility of tr	rial in July or August of 2021. However, attorney
6	and witness scheduling conflicts preclude trial dur	ing those months.
7	CHRISTENSEN JAMES & MARTIN	ROTHNER, SEGALL & GREENSTONE
8	By: /s/ Evan L. James	By: <u>/s/ Eli Naduris-Weissman</u>
9	Evan L. James, Esq. Nevada Bar No. 7760	Eli Naduris-Weissman, Esq. Pro Hac Vice
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14	Luisa Blue, and Martin Manteca	
15	By: /s/ Michael J. Mcavoyamaya	_
16	Michael J. Mcavoyamaya, Esq. Nevada Bar No. 14082	
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19	mmcavoyamayalaw@gmail.com	
20	Attorney for Plaintiffs	
21		It is so ordered:
22		it is so ordered.
23		United States District Court Judge
24		
25		Dated:
26		
27		

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2	CERTIFICATE OF SERVICE	
3	I am an employee of Christensen James & Martin and caused a true and correct copy of the	
4	foregoing document to be served in the following manner on the date it was filed with the Court's	
5	ECF System.	
6	<u>✓</u> <u>ELECTRONIC SERVICE</u> : Through the Court's E-Filing System to the following:	
7	<u>VIA UNITED STATES MAIL</u> :	
8		
9	Michael J. Mcavoyamaya, Esq. Email copy to: mcavoyamayalaw@gmail.com 4539 Paseo Del Ray	
10	Las Vegas, NV 89121	
11	Jonathan Cohen, Esq. Email copy to: jcohen@rsglabor.com	
12	Eli Naduris-Weissman, Esq. Email copy to: enaduris-weissman@rsglabor.com Carlos Coye, Esq. Email copy to: ccoye@rsglabor.com	
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14	510 South Marengo Avenue Pasadena, California 91101-3115	
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17	CHRISTENSEN JAMES & MARTIN	
18	By: <u>/s/ Evan L. James</u> Evan L. James	
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